

(“IDCPA”) §537.5201 *et seq.* Attached as “Exhibit A” is a copy of the Original Notice and Petition for a Money Judgment.

3. This Court has jurisdiction over Plaintiff’s claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claims are founded on a claim or right arising under the laws of the United States. This Court has supplemental jurisdiction over Plaintiff’s joined common law claims, pursuant to 28 U.S.C. § 1441(c).

4. West received the Original Notice and Petition for a Money Judgment on or about June 4, 2014. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which West received Plaintiff’s Complaint. *See* 28 U.S.C. § 1446.

5. Notice of this Notice of Removal of this action is being immediately provided to the Iowa District Court for Polk County. *See* “Exhibit B.”

WHEREFORE, Defendant West Asset Management, Inc. gives notice that this action is removed from the Iowa District Court for Polk County, to the United States District Court for the Southern District of Iowa.

Dated: June 24, 2014

Respectfully submitted,

/s/: Lance W. Lange
Lance W. Lange

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Attorney for Defendant, West Asset Management, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2014, the foregoing **Notice of Removal** was served via U.S. regular mail on the Clerk of the Court and Plaintiff at the below addresses:

Ashley Zubal
Marks Law Firm, P.C.
4225 University Avenue
Des Moines, Iowa 50311

Clerk of the Court
Iowa District Court – Polk County
500 Mulberry, Suite 408
Des Moines, Iowa 50309

/s/: Lance W. Lange

Lance W. Lange
Attorney for Defendant,
West Asset Management, Inc.